

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NWDC RESISTANCE and COALITION OF  
ANTI-RACIST WHITES,

Plaintiffs,

v.

IMMIGRATION & CUSTOMS  
ENFORCEMENT, et al.,

Defendants.

No. 3:18-cv-05860-JLR

**DECLARATION OF ROBERT  
GUADIAN**

I, Robert Guadian, declare the following pursuant to 28 U.S.C. § 1746, and state that under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

**I. INTRODUCTION**

1. I am the Deputy Assistant Director for Field Operations – East, within the U.S. Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations. I have served in this capacity since August 2020.
2. ICE’s enforcement and removal efforts are conducted by its 25 national field offices. At Headquarters, the Field Operations Division provides guidance to and coordination

1 among those offices. In my current position as Deputy Assistant Director for Field  
2 Operations – East, I oversee, direct, and coordinate all enforcement and removal field  
3 operations throughout the Nation’s 12 eastern field offices to enhance national security  
4 and public safety while ensuring such activities further the policies of DHS and ICE. As  
5 an operational program of ICE, Enforcement and Removal Operations is responsible for  
6 the planning, management, and direction of broad programs relating to identification,  
7 apprehension, detention, and removal of noncitizens who are removable from the  
8 United States under the immigration laws. Its mission is to protect the homeland  
9 through the arrest and removal of noncitizens who undermine the safety of our  
10 communities and the integrity of our immigration laws.

- 12 3. Since 1997, I have worked in various other positions within ICE and the former  
13 Immigration and Naturalization Service. Prior to my current position, I held several  
14 positions with ICE Enforcement and Removal Operations, including the Field Office  
15 Director for the Chicago Field Office, Deputy Field Office Director for the Dallas Field  
16 Office, and Assistant Field Office Director for the San Antonio Field Office.
- 18 4. Due to my experience and the nature of my official duties, I am familiar with ICE  
19 operations throughout the United States. This declaration is based upon my personal  
20 knowledge, review of official documents and records maintained by ICE, and  
21 information provided to me in the course of performing my official duties.
- 23 5. I am aware Plaintiffs intend to file certain documents as exhibits in support of their  
24 opposition to Government’s Motion for Summary Judgment.
- 26 6. I am also aware that during discovery Government had produced and designated some  
27 information in these exhibits as “Confidential Subject to Protective Order” or for

1 “Attorneys Eyes only” because there is a good cause why it should not be part of the  
2 public record as explained in further detail below. The information sought reflects  
3 certain Personally Identifiable Information (PII) covered by the Privacy Act and/or the  
4 DHS privacy policy. *See* DHS Instruction No. 262-16-001, *DHS Privacy Policy*  
5 *Regarding Collection, Use, Retention, and Dissemination of Personally Identifiable*  
6 *Information* (May 4, 2022), attached as Exhibit A.

- 7
- 8 7. I am aware that the disclosure of this information concerning ICE ERO officers is  
9 regularly withheld under requests received pursuant to the Freedom of Information Act  
10 (FOIA), where ICE withholds law enforcement and non-law enforcement personnel  
11 names and other personally identifiable information (PII) under the (b)(6) and (b)(7)(C)  
12 exemptions. Exemption 6 allows an agency to withhold all information about  
13 individuals in "personnel and medical files and similar files" when the disclosure of  
14 such information "would constitute a clearly unwarranted invasion of personal  
15 privacy." The Exemption 6 analysis requires a balancing of the public's right to  
16 disclosure against the invasion of an individual's privacy. Exemption 7(C) is limited to  
17 information compiled for law enforcement purposes and requires that the disclosure of  
18 the information "could reasonably be expected to constitute an unwarranted invasion of  
19 person privacy." Therefore, ICE utilizes both exemptions when it withholds  
20 information of ICE personnel, with one of the justifications being that the disclosure of  
21 such information could conceivably subject ICE personnel to harassment and  
22 annoyance in conducting their official duties and in their private lives, and also place  
23 them in danger.  
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- 1 8. I am aware that on June 11, 2020, the Office of Personnel Management (OPM) granted  
 2 ICE's request to be designated as a Security Agency under OPM's official Data Release  
 3 Policy. Such a designation ensures that OPM withholds all relevant personally  
 4 identifiable information (PII) of all ICE personnel under FOIA Exemption 6. Many of  
 5 the incidents reflected below were included in ICE's request to obtain such a  
 6 designation, and OPM noted that ICE's letter, combined with ICE's supporting  
 7 documentation, were sufficient to showcase the heightened risk of harassment and or  
 8 attack that ICE personnel are subjected to by virtue of their employment at ICE.  
 9

## 10 **II. PII SHOULD REMAIN UNDER SEAL**

- 11 9. Documents contain the PII of current and/or former non-public facing ICE employees,  
 12 many of whom may work(ed) as law enforcement officers undercover or in plainclothes,  
 13 and whose names are not otherwise known to the public. Furthermore, there is an  
 14 increased risk of harm that ICE officers will experience doxing—the dissemination of  
 15 personal information—if their PII is made public. Public disclosure of ICE officers' PII  
 16 directly endangers ICE officers.  
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### 18 **A. INCIDENTS OF HARASSMENT AGAINST ERO IN THE SEATTLE AREA OF** 19 **RESPONSIBILITY (AOR)**

- 20 10. ICE has seen an increase in the level of threats and harassment directed to its personnel  
 21 nationwide, to include the Seattle AOR. Within the last two years, incidents of  
 22 harassment over the Internet, physical protests, acts of vandalism, and acts of violence  
 23 have been perpetrated on ICE employees, to include the Seattle AOR.  
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 25 11. On April 27, 2020, ICE Chief Intelligence Officer in the Seattle AOR notified the  
 26 Field Office Director for Seattle that she, along with an ERO Officer In Charge of an  
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immigration detention facility, were doxed, whereby their names, job titles, home addresses, social security numbers, and social media handles were posted to an online forum along with links to negative news stories and reports related to the Northwest Detention Center – a privately-run detention center operated on behalf of ICE. *See* Exhibit B attached. The posting of their information was linked to Salish Sea Black Autonomists, an online network group self-described as “Insurrectionary Anarchists/Autonomists/AntiState Communists struggling for liberation.” Additionally, this group is responsible for promoting a “May Day Seattle” Bingo game whereby one of the Bingo squares is to “DOXX AN ICE AGENT.” *See* Exhibit C attached.

12. On July 8, 2020, a social media user using the Twitter account –

@Manic\_Pixel\_DreamBoi – posted a link to a document that contained personally identifiable information of over 6,300 Portland, Oregon-based federal, state, and local law enforcement personnel. *See* <https://pugetsoundanarchists.org/ice-agents-in-seattle-doxxed/>. The document included the names and employment information of at least 6,053 state and local law enforcement personnel and 312 federal law enforcement and support personnel. *Id.* Furthermore, the document revealed the personal addresses of over 35 DHS personnel, to include ICE, the dates of birth of two ICE personnel, the phone numbers of seven ICE personnel, and various social media profiles of 16 DHS personnel, to include ICE. The posted link was to a Google Document along with the following message: “check out this collection of like every PPB, MCSO, ClackCoCSO, WashCoSO, ORStatePolice, FBI, DOJ, USMarshal, FPS DHS, ICE, CBP swine in Portland Metro Area. (big ups to Totality of Circumstance on KBOO for the 2019 PPB archive with way more context) <https://t.co/8A8X2vdDBK>.”

1 13. On June 30, 2018, protesters gathered in front of the home of the ERO Deputy Field  
2 Office Director. This protest followed a doxing incident from June 21, 2018, where his  
3 name and home address were listed on a website page belonging to Puget Sound  
4 Anarchists, along with several other ERO officers and other ICE personnel. The  
5 website page contained the header “ICE Agents in Seattle Doxxed,” along with the  
6 message “[u]se this information in whatever way inspires you. . .”

7  
8 14. In July 2018, an ERO Assistant Field Office Director was approached at her home by  
9 representatives of Olympia Democratic Socialists of America. These representatives  
10 also approached other individuals in her neighborhood to pass out a flyer titled  
11 “Neighborhood Alert: ICE Operative in Vicinity.” The flyer included her name,  
12 position with ICE, and a discussion about ICE and its policies, noting “[o]ur  
13 immigration system, as structured, organized, and administered through the DHS, uses  
14 & misuses statute in order to apply a veneer of legality to the subjugation of our friends,  
15 neighbors, brothers, & sisters. If you believe that a healthy society is a function of  
16 healthy & vibrant families and communities, you should be very dismayed that ICE is  
17 operating in your name . . .”

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19 15. On July 13, 2019, a male, later identified as Willem Van Spronsen, targeted the  
20 Northwest ICE Processing Center. It was reported that he was armed with a rifle and  
21 was throwing incendiary devices at the facility and vehicles in the parking lot. A vehicle  
22 was set on fire and engulfed in flames. He also attempted to ignite a large propane tank  
23 by the building. The male continued throwing ignited objects at the building and cars  
24 when officers arrived on the scene. *See* <https://www.seattletimes.com/seattle->  
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1 news/crime/tacoma-police-armed-man-throwing-incendiary-devices-shot-outside-ice-  
2 detention-center/

3 16. The targeted harassment has extended to other ICE personnel, to include non-law  
4 enforcement, in the Seattle AOR. During the summer of 2018, during the “Occupy  
5 ICE” movement in Portland, Oregon, an ICE attorney working in Portland was  
6 continuously harassed at her home by anti-ICE activists after her personal information  
7 was posted publicly throughout the city and online. The perpetrators posted flyers  
8 throughout the city containing her and her family’s picture, home phone number, and  
9 other identifying information with a note stating that she was a “Gestapo Agent” and a  
10 “monster that prosecutes immigrant families while living in safety and comfort with her  
11 husband in their newly purchased home.” Later, two dozen eggs and large balls filled  
12 with paint were thrown at her house and vehicles in the middle of the night, causing  
13 significant property damage. The employee and her spouse also received threatening  
14 text messages on their personal cell phones and through their Facebook accounts.  
15  
16 Similar incidents were perpetrated against other ICE personnel – both law enforcement  
17 and non-law enforcement, where various flyers were posted in neighborhoods with  
18 pictures of ICE personnel, their names, age, home addresses, work addresses, social  
19 media handles, and derogatory comments, such as “[t]his monster has worked for 9  
20 years violently ripping immigrant families apart while living in safety and comfort with  
21 his family.” Other incidents during this time period involve the Acting Field Office  
22 Director’s home being vandalized with raw eggs thrown against it. Pictures of these  
23 various incidents are attached.  
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1 17. On January 24, 2020, an ICE Public Affairs Officer in Washington State reported  
2 having received a voicemail from an individual stating, “It’s shocking how willing you  
3 are to. Let it be documented that [you] are on the wrong side of history. This will not  
4 end well for you.” Another voice message left by the same caller stated, “You can’t just  
5 terrorize people like this. We are not going to stand for this. You are going to be  
6 shot/shut (unintelligible) down.”

7  
8 **B. OTHER INCIDENTS OF HARASSMENT AGAINST ICE PERSONNEL IN**  
9 **THE NATIONWIDE**

10 18. Beginning in 2018, ICE has seen an increase in the number of threats and harassment of  
11 its employees. For example, between October 2020 and December 2023, the ICE  
12 Office of Professional Responsibility (OPR) Threat Management Unit (TMU) identified  
13 approximately 176 threats directed towards ICE employees ranging from doxing of  
14 employees, calls to burn/storm detention centers, demonstrations at employees’  
15 residences and hotels housing non-citizens, to bomb threats and threats calling for the  
16 killing or harming of ICE Agents. Other examples prior to this time have included  
17 employees’ personal information being posted on a variety of social media platforms  
18 and websites including Twitter, Facebook and the Puget Sound Anarchist. In addition  
19 to social media postings, “flyers” with ICE employees’ personal information have been  
20 posted in and around the neighborhoods of where these employees live to harass those  
21 ICE employees. During this time, two ICE employees reported the “egging” of their  
22 residences as well as the posting of flyers, bearing their pictures and personal  
23 information, in their neighborhoods. Both employees were previously doxed prior to  
24 these events. Subsequent to the “egging” incident, one of these employees had their  
25 house and car vandalized with red paint balls during the night. During this same time  
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frame, another employee reported discovering two small fires burning in the parking area located in front of their house. The information contained on these social media websites and flyers provided names, duty position, home addresses, social media accounts, and sometimes family member information associated with ICE employees.

19. On June 19, 2018, Antifa posted the personal information of 1,595 ICE employees in response to ICE's "inhumane" conduct. *See* <https://dailycaller.com/2018/06/19/antifa-spreads-ice-agents-identities/>. The person responsible for this unauthorized dissemination admitted to compiling the personal information from LinkedIn and posting it "with the hope . . . activists will find it useful." *Id.* Among the personal information that was disseminated was a photograph of ICE's chief technology officer and his son. *Id.*

20. This threatening behavior was encouraged and exacerbated, as other activists have analogized ICE employees to Nazis and called for the "doxing" of "more Nazis." *Id.* The initial list of 1,595 ICE employees became the precursor to "ICE Patrol," an internet-based searchable website maintained and operated by WikiLeaks. *See* <https://www.newsweek.com/icepatrol-wikileaks-publishes-database-ice-employeesdespite-attempts-censor-990261>. At one point, the "ICE Patrol" website featured the personal information of approximately 9,243 ICE employees. A few days after the initial list was posted, another activist used "ICE Patrol" to obtain and publish on the internet the names of five Ohio-based ICE employees, the names of their spouses, and their home addresses. *See* <http://www.mockingbirdpaper.com/content/meet-ice-agents-detention-centers-and-corporations-who-profit-them-ohio>. This personal information was published under

1 photographs of Hermann Göring, Albert Speer, Rudolf Hess, and several other high-  
2 ranking Nazis. *See id.*

3 21. Another organization called Puget Sound Anarchists suggested that it used that same list  
4 to obtain and publish the names and home addresses of 36 Washington-based ICE  
5 employees, along with one employee's date of birth, phone number, spouse's name,  
6 spouse's work address, and personal email addresses. *See*  
7 <https://pugetsoundanarchists.org/ice-agents-in-seattle-doxxed/>. The Puget Sound  
8 Anarchists tacitly suggested that the published home addresses should be used for  
9 harassment or violence by urging people to "[u]se this information in whatever way  
10 inspires you." *Id.*

12 22. On June 28, 2018, another activist group published the names and photographs of 10  
13 San Antonio-based ICE employees, including the photographs of the young children of  
14 two of those employees. *See* [https://autonomeia.blackblogs.org/2018/06/28/san-](https://autonomeia.blackblogs.org/2018/06/28/san-antonio-ice-agents/)  
15 [antonio-ice-agents/](https://autonomeia.blackblogs.org/2018/06/28/san-antonio-ice-agents/).

17 23. The indirect threats soon intensified and materialized into advocacy for violent action.  
18 On July 2, 2018, just weeks after ICE employees were "doxed" en masse, a 33-year-old  
19 man tweeted his frustration over the government's immigration policies and proclaimed  
20 "I will scrounge and literally give \$500 to anyone who kills an ice agent." *See*  
21 [https://www.washingtonpost.com/nation/2019/12/09/brandon-ziobrowski-ice-agent-](https://www.washingtonpost.com/nation/2019/12/09/brandon-ziobrowski-ice-agent-twitter-threat/)  
22 [twitter-threat/](https://www.washingtonpost.com/nation/2019/12/09/brandon-ziobrowski-ice-agent-twitter-threat/).

24 24. On July 10, 2019, ICE's ERO Austin office reported observing anti-ICE graffiti in two  
25 different places on the J.J. Pickle Federal Building. One message read "FIGHT ICE  
26 WITH FIRE" and the other read "COMBAT US IMPERIALISM" with a hammer &  
27

1 sickle symbol. Since this incident, ICE employees associated with the office reported  
2 having been followed and surveilled.

3 25. On August 13, 2019, one or more unidentified individual(s) fired at least three rounds of  
4 ammunition at the Jefferson Bank Building, which houses the ICE ERO San Antonio  
5 Field Office. One round impacted an ERO Operations Center window, striking the  
6 blinds and falling to the floor. While the office was occupied at the time by five ERO  
7 San Antonio Deportation Officers, no personnel were struck by the rounds and no  
8 injuries were reported.  
9

10 26. On July 18, 2019, a social media user was identified as creating a Twitter account and  
11 posting personal data on a continuous and automatic loop (Twitter bot)—data which the  
12 Office of Personnel Management (OPM) released to the public through requests under  
13 the Freedom of Information Act (FOIA) prior to ICE’s designation as a Security  
14 Agency (which now ensures that OPM withholds all relevant personally identifiable  
15 information (PII) of all ICE personnel under FOIA Exemption 6.) The previously  
16 released OPM data included the names, salaries, occupations and work locations of ICE  
17 and other DHS employees. The posting included a statement that the named employees  
18 are “part of the bureaucracy that is locking children and families in concentration camps  
19 at the border.”  
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21 27. In December 2019, another man tweeted his support for violence directed at ICE,  
22 advocating “[w]e need to kill all ICE agents” and asked rhetorically “why can’t mass  
23 shootings occur at @ICEgov buildings them [m\*\*\*\*r-f\*\*\*\*\*s] need to get smoked.”  
24 See [https://www.nj.com/bergen/2019/12/we-need-to-kill-all-ice-agents-nj-man-posted-](https://www.nj.com/bergen/2019/12/we-need-to-kill-all-ice-agents-nj-man-posted-on-twitter-federal-agents-arrested-him.html)  
25 [on-twitter-federal-agents-arrested-him.html](https://www.nj.com/bergen/2019/12/we-need-to-kill-all-ice-agents-nj-man-posted-on-twitter-federal-agents-arrested-him.html). He then promoted violent behavior toward  
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ICE by posting a euphemism from a Martin Scorsese film that refers to killing people.

*See id.*

28. In February 2020, a social media user created a post on a popular social media outlet, which implored viewers to vote for which ICE employee residence to target with a residential demonstration. Specifically, the post listed the names of two ICE employees (one law enforcement and the other non-law enforcement) and one ICE contractor.

29. On August 19 and 20, 2020, criminals targeted ICE offices in Portland vandalizing property, breaking windows, throwing rocks and glass bottles, and injuring some officers. *See* <https://www.kgw.com/article/news/local/protests/protesters-rally-in-southwest-portland/283-2b0e9903-d8df-44bc-98e3-607a8f0f7931>; <https://www.kgw.com/article/news/local/protests/portland-protests-headed-toward-ice-facility-for-the-second-night-in-a-row/283-405c9a6f-0f47-46c0-a89b-4f337451d146>.

30. From October 2018 to December 2023, OPR's Threat Management Unit reviewed over 22,000 online postings of potential threats against ICE employees and referred over 700 threats for further assessment. Recent examples of threatening posts and incidents include:

- a. In June 2020 a social media user posted a threat stating, "Abolish ICE.... Kill anyone who voluntarily signed up...I swear I'll choke you until there is no life in your eyes."
- b. In October 2020, a social media user posted a threat stating, "Go burn down an ICE facility."
- c. In October 2020, the HSI Tip Line received an email stating the following –  
 "Based upon the continued use of your agents as agents of terror to the American public, we're going to become a terror to your agents. After the

1 attempted intimidation of a US citizen in Boston, expect to see your agents be  
2 more at risk than ever before. The Boston Bombing will be nothing compared  
3 to how much fear your office will be in when the public is done with you. Feel  
4 free to try and hunt me down to try and intimidate me but it's a path that you  
5 won't like the end of.”

6 d. In January 2021, a social media user posted, “F\*\*k around and kill some ICE  
7 agents this year.

8 e. In February 2021, a social media user posted, “If you feel bad about Gina go  
9 shoot a member of ICE, putting down ICE members is legal according to the  
10 constitution.”

11 f. In March 2021, a social media user posted, “If you think that’s scary, wait till  
12 you find out I am personally issuing each individual released with a printout of  
13 every ICE agent home address, and a map.”

14 g. In June 2021, a demonstration occurred at the residence of an ERO employee in  
15 West Newbury, Massachusetts. During the demonstration, several individuals  
16 put up signs and body bags across the front law of the employee’s residential  
17 property.

18 h. In July 2021, a social media user made a threatening post aimed at ICE Agents  
19 stating, “i will end all of you then kill myself and kill you again.”

20 i. In September 2021, a social media user posted, “Also, many/most sheriff’s  
21 departments are a complete sham, and, as always, ICE agents should be killed  
22 on sight.”

- 1 j. In October 2021, a social media user posted, “if i remember Django correctly,  
2 I’m supposed to find out where those ICE agents live and then whip them.”
- 3 k. In October 2021, a social media user posted, “I support the 2nd amendment right  
4 to shoot members of ICE.”
- 5 l. In January 2022, the TMU was made aware of racially charged comments  
6 towards the (A) Director, in which the social media user @TrumpWarRoom  
7 posted a message stating “Maybe this'll interest you guys..how about me  
8 targeting..”taking down” the Acting Director of I.C.E... US Immigration and  
9 Customs Enforcement..that fck!! .. Shoulda stuck to pickin cotton.. family  
10 history and all that.”
- 11 m. In February 2022, a social media user posted, “im about to march up to an ICE  
12 agent and smack him.”
- 13 n. In April 2022, ICE was notified about a possible Vehicle Borne Improvised  
14 Explosive Device threat to the ICE ERO detention facility, Nevada Southern  
15 Detention Center, in Pahrump, Nevada.
- 16 o. In May 2022, a social media user posted, “to whom it may concern - im nuking  
17 ICE headquarters.”
- 18 p. In June 2022, a social media user posted, “Bombing ice agents trucks is rad.”
- 19 q. In January 2023, a social media user called for people to attack federal  
20 courthouses, burn down police precincts, firebombing ICE detention centers and  
21 rioting in Atlanta.
- 22 r. In April 2023, the TMU was made aware of a specific threat to the HSI Office in  
23 Mobile, AL. An individual entered the HSI Mobile Office and threatened to  
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1 shoot up the office. Subsequently, the subject left the office without firing any  
2 shots.

3 s. In May 2023, the TMU learned of a specific threat to HSI Office in  
4 Albuquerque, NM. Office. An individual expressed homicidal ideations  
5 specifically related to the HSI office.

6 t. In June 2023, a social media user posted a message depicting a sniper shooting  
7 into a DHS Law Enforcement Vehicle and killing those inside.

8  
9 31. Due to the increase in general and targeted harassment and threats, ICE has had to take  
10 extensive action to ensure the safety and security of ICE personnel reporting to work  
11 across the country, including but not limited to: regularly advising employees on the  
12 necessary steps to take to enhance their personal safety and security; assessing the  
13 security posture at all satellite field offices; partnering with the Federal Protective  
14 Service (FPS) to ensure all FPS-recommended security countermeasures are  
15 implemented wherever feasible; engaging state/local partners to ensure prompt response  
16 when threats against agency personnel and/or facilities arise; and reassigning agency  
17 personnel to identify, investigate, and mitigate threats directed toward ICE employees,  
18 operations, and facilities.

19  
20 32. From a personal standpoint, I can express how such incidents noted above directly  
21 impact the ICE workforce, where we constantly need to be vigilant and aware of our  
22 safety. While law enforcement positions have an inherent level of risk associated with  
23 them, to be subjected to or have your fellow colleagues be subjected to targeted  
24 harassment is an added stress that adversely impacts our daily livelihood, our families,  
25 and our ability to effectively carry out the ICE mission especially when NWDC  
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Resistance's (La Resistencia's)<sup>1</sup> organizational mission is to abolish ICE entirely. La Resistencia 30(b)(6) Tr. 27:7-28:8; Dkt. 144.

### NON-PARTY PII

33. Documents also contain PII of the third parties, who are not parties to the complaint and who have not consented to public disclosure of their PII, pursuant to the DHS Privacy Policy (Exhibit A) or pursuant to the requirements set forth in the Privacy Act of 1974. The Policy extends the Privacy Act's protections to people regardless of their immigration status and shields from public disclosure any identifying information, including their names, dates of birth, and places of birth. Disclosure of the non-parties' personal information may intrude upon their personal privacy and possibly subject them to harassment or scrutiny from the public.

34. Attached as Appendix A are the exhibits currently under seal in which ICE has endeavored to redact lower-level employee information and non-party immigration information.

Executed on this 11th Day of December 2023.

**ROBERT**

**GUADIAN JR**

Robert Guadian

Deputy Assistant Director for Field Operations

U.S. Department of Homeland Security (DHS)

U.S. Immigration and Customs Enforcement (ICE)

Enforcement and Removal Operations (ERO)

Digitally signed by  
ROBERT GUADIAN JR

Date: 2023.12.11

16:55:56 -05'00'

<sup>1</sup> Defendants understand that NWDC Resistance changed its name to La Resistencia.